

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

MARK D. CHAPMAN, *et al.*,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

No. 2:19-cv-12333-TGB-DRG

Hon. Terrence G. Berg
Magistrate Judge David R. Grand

**DECLARATION OF APRIL N. ROSS
IN SUPPORT OF THE JOINT MOTION FOR AN ORDER AUTHORIZING
GENERAL MOTORS TO FILE MOTION TO EXCLUDE PLAINTIFFS’
EXPERT EDWARD M. STOCKTON IN PARTIALLY REDACTED FORM
AND TO FILE CERTAIN EXHIBITS UNDER SEAL**

I, April N. Ross, declare as follows:

1. I am a partner with the law firm Crowell & Moring LLP. I represent General Motors LLC (“GM”) in this matter. I make this declaration based on my personal knowledge of the facts set forth herein and if called as a witness, I could and would competently testify thereto.

2. On March 2, 2022, the parties filed a Joint Motion to Seal and Redact Plaintiffs’ Motion for Class Certification and Appointment of Class Representatives and Class Counsel (ECF No. 111).

3. On March 2, 2022, plaintiffs filed a sealed Motion for Class Certification and Appointment of Class Representatives and Class Counsel (ECF

No. 111) and a redacted Motion for Class Certification and Appointment of Class Representatives and Class Counsel (ECF No. 112).

4. On April 20, 2022, the Court granted the parties' joint motion to seal.

5. On May 6, 2022, GM intends to file a Motion to Exclude Plaintiffs' Expert Edward M. Stockton ("Motion to Exclude").

6. GM intends to attach as exhibits to its Motion to Exclude certain information that was previously sealed by the court in Mr. Stockton's expert report (ECF No. 112-22), and certain portions of Mr. Stockton's supplemental report that incorporate additional documents (the "Confidential GM Exhibits") that are designated by GM or by a GM supplier, Robert Bosch GmbH, as Confidential or Highly Confidential pursuant to the Stipulated Protective Order, ECF No. 44 entered by the Court because those documents contain non-public confidential business information.

7. Consistent with Paragraph 7(c) of the Stipulated Protective Order, GM is filing a joint motion for leave to file under seal portions of its Motion to Exclude and portions of exhibits to that motion that disclose the contents of the Confidential GM Exhibits.

8. In support of the joint motion for leave to file under seal, GM maintains and re-affirms its assertion of confidentiality with respect to the following documents:

a. Documents reflecting non-public competitively-sensitive confidential GM warranty and repair data, bearing Bates numbers: GM_CP4_000224548, GM_CP4_000224902.

b. Documents reflecting non-public competitively-sensitive confidential operating and financial information about GM-authorized dealerships, bearing Bates numbers: GM_CP4_000224543, GM_CP4_000224899.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th Day of May, 2022 at Alexandria, Virginia.

/s/ April N. Ross
April N. Ross